**Submission to Psychology Board of Australia**

**Area of practice endorsements registration standard.**

Recognition of the need for an approved postgraduate degree in clinical psychology as the basic necessity for work in mental health has been in place since the early 1970’s.

As clinical psychology practitioners both of us have been closely involved, and particularly Professor Jackson, in the education and training of clinical psychologists over a lengthy period. We recognise the unique contribution of clinical psychology postgraduates in the workforce following graduation, and we have also been concerned by the less competent contributions made by those working in the mental health area who do not possess a postgraduate qualification in this complex and challenging area of professional practice.

The introduction of “bridging” programs that allow pursuit of endorsement without a postgraduate degree in clinical psychology was a regressive step for our mental health profession, since it ignores the unique contribution that clinical psychologists make to mental health in the community at large. The length and breadth of intensive postgraduate work is overlooked and the profession devalued when routes other than a postgraduate degree in clinical psychology are introduced or proposed. The further current proposal to allow psychologists without any postgraduate training to seek endorsement is a further weakening of both the standards and status for the clinical psychology profession, and is unacceptable.

In particular, we refer to the Board’s document “Overview of consultation, Background”, and point 11. This proposes only a “one-year full-time program” as sufficient for both “bridging” and “stand-alone” applicants, the latter being for psychologists without any postgraduate training at all. The second is particularly regressive since it allows pathway to endorsement without any requirement for postgraduate experience.

Further, in point 21, dot point 1, p.3, we believe the proposal would have negative impacts for the “broader regulatory environment” by weakening the essential requirements for practice in an area of endorsement. Second, dot point 2 addresses potential workforce impacts and we regard those as negative as well, in that consumers will have no ready means of determining whether the endorsed workforce psychologist in question possesses the postgraduate skills needed for specialist practice. This objection is underscored by the statement that the proposal will “promote transparency and accountability by providing the public with more information about registered psychologists training…” (Attachment E, section 1, dot point 4). We regard the proposal as not providing the kind of information that ensures “transparency and accountability…regarding psychologists training”. Once endorsed, the use of specialist title does not inform consumers of the fact that not all title holders will possess the necessary postgraduate education and training in the endorsement area. This outcome, which is not only a regressive development in terms of contemporary best practice, also significantly reduces transparency and accountability for the public, and for consumers in particular.

In conclusion, we find no sound basis for allowing psychologists other than those with the approved postgraduate training and education to access endorsement as a professional practitioner. In fact, the proposal is markedly backward-looking to an extent that is unacceptable in contemporary specialised practice.

We therefore propose that “Option 1” be retained in order to ensure proper standards of education and training for those wishing to obtain endorsement as a clinical psychologist, and for the best possible protection and public accountability with our mental health profession. We also note that community awareness and accessing of psychologists in mental health is a burgeoning phenomenon, and the taxpayer costs for the community via the Better Access scheme especially with higher rebates for endorsed practitioners is a large responsibility. This situation places even greater emphasis on the need for ensuring accountability by maintaining the possession of approved postgraduate education and training as the only appropriate pathway to endorsement as a clinical psychologist.

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